



Safeguarding Children & Young People Policy

March 2024

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Safeguarding Children & Young People Policy

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1 Policy Purpose

- 1.1 First Choice Homes Oldham (FCHO) is committed to safeguarding and promoting the safety and welfare of children and young people who live in a FCHO property, who use, are engaged in, or connected to our services.
- 1.2 This policy aims to deliver safe working practices which identify, assess, and manage safeguarding concerns and ensure appropriate action is taken to safeguard the wellbeing of children and young people. We believe that every child or young person has the right to feel safe and be protected from any situation or practice that could result in them being harmed or abused.
- 1.3 Safeguarding is everyone's responsibility and FCHO is committed to safeguarding and promoting the welfare of any person at risk. FCHO expects all colleagues, contractors, and third-party partners to share this commitment.
- 1.4 It is the responsibility of all individuals working for or on behalf of FCHO, including colleagues, contractors, agency colleagues, managing agents, volunteers, Board Members and involved customers, to understand, report and act - in accordance with this policy and associated procedures - to any concerns of actual or potential abuse of a child or young person.

2 Policy Details

2.1 Aims

- 2.1.1 **Safeguarding is Everyone's Responsibility** - This policy applies to all FCHO colleagues (including those on fixed term contracts), Board Members, agency workers, consultants, volunteers, contractors, and third-party partners. This policy also applies to any developers, contractors and sub-contractors who are providing services to FCHO and its tenants or customers.
- 2.1.2 The purpose of our Safeguarding Children and Young People Policy is to:
 - provide a clear statement that FCHO will not tolerate or collude with any form of neglect or abuse.
 - Ensure effective governance and a clear line of sight with regards to responsibilities of safeguarding.
 - promote and safeguard the welfare children and young people and will be proactive in responding to any allegation or suspicion of abuse.
 - empower our customers by ensuring they are fully aware of what constitutes abuse and how to report it.
 - stop abuse or neglect wherever possible, prevent harm and reduce the risk of abuse or neglect to children and young people.
 - ensure that everyone is clear about their individual and corporate roles and responsibilities in preventing and responding to abuse or neglect.
 - provide and/or signpost to relevant agencies support and protection for victims and witnesses affected by abuse.
 - publish our policy so that customers can be made aware of FCHO's approach to safeguarding children and young people and our responsibilities.

- provide appropriate training and support for our colleagues to enable them to identify the types and causes of abuse, the role they play in prevention and how to respond to abuse and neglect.
- provide a network of trained Designated Safeguarding Officers who can provide support and guidance to colleagues and customers, whilst promoting safeguarding across the organisation.
- Work in partnership with our agents, partners, and stakeholders to promote and safeguard the welfare of all our customers and proactively work with them in responding to allegations or suspicions of abuse.
- ensure procedures are in place that will adequately and promptly deal with allegations of safeguarding and that information is shared appropriately where there is potential risk to others.
- ensure enquiries will be carried out promptly and with sensitivity, and appropriate action will be taken.
- set out clear professional boundaries within our safeguarding procedures when working with or coming into contact with children and young people.
- Regularly review our approach and performance in safeguarding children and young people, with our customers, agents, and partners, and will focus on continuous improvement.

2.2 Safeguarding Children and Young People

2.2.1 Context

FCHO is in contact with children throughout its day-to-day activities and is required through law, the regulator, and its organisational objectives to have clear policies and procedures on Safeguarding and working with local agencies.

Local authorities have overarching responsibility for safeguarding and promoting the welfare of all children and young people in their area. They have a number of statutory functions under the Children's Act 1989 as amended in 2004 which make this clear, including specific duties in relation to children in need and children suffering, or likely to suffer, significant harm, regardless of where they are found, under sections 17 and 47 of the Children Act 1989. The Director of Children's Services and Lead Member for Children's Services in local authorities are the key points of professional and political accountability, with responsibility for the effective delivery of these functions.

Local authorities have a statutory duty to run Local Safeguarding Children's Boards. They are the lead agencies with responsibility for co-ordinating safeguarding and conducting case management and reviews. They will have expertise in handling cases of abuse, providing support and counselling to victims and assisting the police with any criminal investigations. Whilst FCHO is not a statutory agency, we have obligations to safeguarding Children and Young People and will work with local authorities to fulfil their statutory functions.

2.2.2 Legal framework

Childrens Act 2004

This act created Local Safeguarding Children Boards and places duties on a range of statutory organisations. Although Registered Providers of Housing such as FCHO is not subject to this act as a statutory agency, Section 10 and 11 places duties on organisations that provide services which may impact upon the

welfare of children. These organisations are expected to have safeguarding provisions in place, by:

- having a designated lead person for child safeguarding matters.
- sharing information with other professionals.
- having safe recruitment practices and whistleblowing procedures.
- training their staff on child safeguarding.
- having a clear child safeguarding policy.
- having a procedure for responding to child protection concerns, including making referrals to local authorities or the police.

2.2.3 Working together to safeguard children 2023

The statutory guidance, issued under the Children Act, on inter-agency working to safeguard and promote the welfare of children applies to statutory bodies such as the police, schools, and local authorities. However, the guidance and expectations detailed in this guidance will be reflected by FCHO throughout this policy and the procedure. In particular, Chapter 3, which highlights the requirements of multi-agency safeguarding arrangements with 'relevant agencies'.

2.2.4 Definitions

FCHO will adopt the following definitions:

a) **Child safeguarding is defined as:**

- Protecting children from maltreatment.
- Preventing impairment of children's health and development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking actions to enable all children to have the best outcomes.

(Working Together to Safeguard Children 2023)

- b) **Children** - A **child** is anyone who has not yet reached their 18th birthday and includes unborn children. Due to their immaturity and dependency on others, all children are at risk of abuse.
- c) **Parent** - The term **parent** includes carers or guardians. It means, in usual circumstances, someone who is legally entitled to take decisions on behalf of the child.
- d) **Abuse and Neglect** - **Abuse** or **neglect** takes many forms and can be caused by single or repeated acts or a failure to act by any other person or persons, or in the case of self-neglect, the victim themselves. The circumstances of each individual case will be considered, so as to not limit what constitutes abuse or neglect. However, FCHO will reference the *Working Together* definition for abuse:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults, or another child or children.

Guidance on the types of abuse and neglect is detailed in the Safeguarding procedure, FCHO will treat as a child or young person safeguarding concern where a child or young person is suspected to be involved in either of the following categories:

- physical abuse.
- sexual abuse.
- emotional or psychological abuse.
- neglect and acts of omission.

Other categories or specific acts of abuse and neglect may be categorised differently by other organisations and FCHO will be aware that abuse may also include, but is not limited to, acts such as online abuse, child sexual exploitation, female genital mutilation, bullying and cyberbullying, domestic abuse, child trafficking, grooming and harmful sexual behaviour. Staff will receive training which covers the indicators of abuse and neglect, and these categories will be explored.

2.2.5 Differences between Children and Adults

FCHO recognises the difference between Adults at Risk and Children and young people when it comes to the approaches used in safeguarding and therefore operates a separate Safeguarding Adults at Risk Policy to ensure the right approaches are carried out.

Consent **is not** required when considering making a safeguarding referral for a Child, however in the appropriate circumstances, speaking with the parent/guardian prior to referrals is seen as best practice. We recognise the importance of the wishes and feelings of a child; however, these may sometimes be contradicted in order to act in the child's best interests. More details can be found within FCHO's Safeguarding Children Policy.

2.3 Governance - Safeguarding Roles and Responsibilities

Whilst FCHO recognises that safeguarding is everyone's responsibility, there are a number of individuals who fulfil specific safeguarding roles in relation to Safeguarding and their responsibilities are listed below.

2.3.1 Designated Safeguarding Lead – Director of Customer Services

- Present an annual report to the Executive Team and the Board on safeguarding activity.
- Provide quarterly data to the board as part of the key performance scorecard.
- Ensure that there is a review, and if necessary, a revision, of the safeguarding policy and procedures on an annual basis or sooner if there is a change in legislation, guidance or an incident that warrants it.
- Provide support to the Operational Safeguarding Leads.
- Have a strategic overview of safeguarding.
- Chair the Safeguarding Committee.
- Co-operate with stakeholders in relation to Serious Case Reviews and/or learning activities.
- Undertake relevant safeguarding training every two years.

2.3.2 Operational Safeguarding Leads – Community Impact Managers

- Maintain an operational overview of safeguarding across all services.
- Provide support for the Designated Safeguarding Officers.
- Meet quarterly with Designated Safeguarding Officers as part of the Safeguarding Committee. to review safeguarding activity including case closures.
- Ensure the safeguarding policy and procedures are implemented.
- Ensure there is compliance with safeguarding policy and procedures through quality assurance processes.
- Co-ordinate the safeguarding training strategy for colleagues and volunteers.
- Discuss with the communications team and Designated Safeguarding Officers about the role of promoting the welfare of adults through social media, the website and other communication methods.
- Own and maintain the central safeguarding log.
- Undertake relevant safeguarding training every two years.

2.3.3 Designated Safeguarding Officers

- Designated Safeguarding Officers will be formed in each department of FCHO and will attend Safeguarding Committee meetings Co-chaired by the Designated Safeguarding Lead and Operational Safeguarding Leads, to learn, reflect and continuously improve approaches to safeguarding.
- Provide support and guidance to staff in their departments who have safeguarding concerns.
- Ensure resources are allocated to support sound safeguarding practice which will include training, supervision, and IT systems within their departments.
- Has an overview of Safeguarding concerns raised within their departments.
- Ensure that there is a coordinated approach to safeguarding across FCHO and its third-party partners.
- Undertake relevant safeguarding training every two years.

2.3.4 Customer Facing Colleagues (Alerters)

- Receive and record information relating to a concern or disclosure concerning a child or young person.
- Assess the information promptly and carefully, clarifying or obtaining more information about the situation as appropriate.
- **Must** speak with Designated Safeguarding Officer/Line Manager if there is a safeguarding concern raised.
- If appropriate i.e., Service Areas Officers/Advisors/Managers, represent FCHO as a landlord at any multi-agency safeguarding meetings/case conferences involving our customers.
- Designated Safeguarding Officers, or colleagues when advised/instructed by Designated Safeguarding Officers/Operational Safeguarding Leads to make safeguarding referrals to Children Social Services or the police without delay in accordance with the procedures.
- Ensure a full record is maintained of the concerns, action taken, liaison with other agencies and outcomes in accordance with the procedures.

- Deal with the aftermath of any safeguarding incident in terms of offering support; Identify and alert the Designated Safeguarding Officers to any safeguarding training needs.
- Keep abreast of developments in safeguarding legislation, practice, and local procedures.
- Undertake relevant safeguarding training every two years.

2.3.5 Governance Reporting

Monitoring of safeguarding will be reported in the Board's quarterly Health, Safety and Wellbeing report. In addition, Board will be alerted of any serious incidents or exceptions to the policy, in a timely manner.

2.4 Training, Recruitment and Supporting Staff

2.4.1 Training

FCHO recognises the obligations on housing providers highlighted within the Working Together 2018 guidance to ensure that appropriate safeguarding training is provided to all staff members.

Training will be delivered in accordance with a competency framework which clearly outlines the knowledge and skills required by colleagues carrying out specific identified roles in relation to safeguarding. This approach ensures that all safeguarding issues are addressed in an appropriate manner.

Anyone working for FCHO and delivering services to our customers will be trained appropriately to fulfil their safeguarding responsibilities. Designated Safeguarding Leads/Champions will be provided with additional specialist training to enable them to carry out their additional duties.

Refresher training will be delivered every two years and on a rolling programme, to ensure that all staff have access to regular learning and development to enable them to fulfill their duties in line with this policy.

All training will be managed and recorded by the Learning and Development team.

It is an expectation that anyone working on behalf of FCHO, e.g., contractors, will have received safeguarding training via their direct employer, clearly outlining the knowledge and skills required when carrying out specific identified roles in relation to safeguarding. However, all such organisations working with FCHO should be provided with details of FCHO's internal policies and procedures, by the Manager responsible for the contract. FCHO will seek assurances from contractors that their staff have received relevant training.

2.4.2 Safe Recruitment Practices

FCHO understands the importance of safe recruitment in order to protect children and young people from abuse or neglect from staff members. All relevant customer facing employees will be subject to FCHO's safe recruitment policy and staff code of conduct. This may include undertaking a Disclosure and Barring Service (DBS) check. Supervision and support will be used to assess and

manage any risk issues relating to employees. Where required, DBS checks will be renewed as appropriate.

Safeguarding will feature in job descriptions (reviewed regularly), person specifications and included in interview questions, where relevant. This will extend to vetting successful applicants, for example through references.

New members of staff will participate in an induction which will include information about safeguarding responsibilities.

2.4.3 **Support for Colleagues and Third Parties**

FCHO recognises its colleagues, and third parties may be emotionally impacted by a safeguarding issue or investigation.

Support will be provided to colleagues who have reported, or are dealing with, incidents involving abuse. Colleagues should contact their line manager or the FCHO Human Resources team in the first instance. FCHO has an employee assistance programme which offers free counselling to members of staff.

FCHO's approach to supporting staff is one of openness and the freedom to be professionally curious. Our infrastructure in having Designated Safeguarding Officers is not only to provide assurance to our board that safeguarding is being appropriately addressed but is also a way of providing support to staff that need it, for example if they are dealing with a complex situation.

2.5 **Contractors, Agents, and Third-Party Partners**

In addition to FCHO colleagues and committees, any contractors, agents, and third-party partners providing services on FCHO's behalf are properly controlled.

All contractors working for or on behalf of FCHO must ensure, as far as is reasonably practicable, they and their employees:

- are suitable to provide frontline services.
- have relevant reference and background checks (e.g., DBS where appropriate) before commencing employment with their employer.
- comply with our Management and Control of Contractors procedures.
- are aware of who to contact with any safeguarding concerns in a FCHO home.
- notify FCHO of any safeguarding incidents or concerns.
- fully co-operate with any investigation into received allegations.
- have adequate systems in place to take appropriate disciplinary action.

Third party contractors, and agents are prohibited from knowingly entering a property where the sole occupant is or appears to be under 16 years of age. If this is the case, they should withdraw from the premises and advise FCHO immediately. Appointments must be re-arranged to a time where an appropriate adult is present.

FCHO will support its main contractors by:

- offering regular Toolbox Talks and consider classroom training, where requested, appropriate, or where learning has been identified.

- supplying a Safeguarding Guidance Booklet to contractors with contact details of our Operational Safeguarding Leads and Designated Safeguarding Officers, information, and support, reporting procedures and the direct line to raise the alert immediately.
- including Safeguarding within their contractor health and safety inspections.

2.6 Confidentiality and Information Sharing

FCHO will share information appropriately with partners that have a statutory responsibility to investigate safeguarding concerns, including Children Social Services and Police Authorities.

Information can be shared lawfully within the parameters of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). FCHO will ensure that all colleagues understand that data protection does not prevent the sharing of information where it would protect the welfare of and/or promote the wellbeing of children and young people. Measures are in place to ensure that data is shared in a secure method and that all partners have measures in place to protect data.

2.7 Partnership Working, Escalation and Resolution

2.7.1 Proactive approach

FCHO recognises the ‘referrer’ and ‘relevant agency’ role of a provider of social housing. FCHO staff also recognise that safeguarding children and young people requires a multi-agency approach. Childrens Social Services take a lead role in safeguarding children and young people and FCHO will endeavour to work proactively with them in sharing information, making safeguarding referrals, attending child in need or child protection meetings as and when required.

2.7.2 Disagreements

Effective working together depends on resolving disagreements to the satisfaction of colleagues and partner agencies, and a belief in partnership and joint working for the ultimate benefit of the child or young person. Whilst each Local Authority may have different processes for escalation, the focus within FCHO will be to ensure resolution and the continuation of good partnership working, managing disagreements professionally and escalating concerns where necessary. At no time must any professional disagreement undermine the safeguarding of a child or young person. The welfare and safety of the individual must remain paramount throughout.

Where a FCHO employee feels they do not have sufficient experience to challenge a partner agency, they must seek guidance from the Designated Safeguarding Lead.

2.7.3 Serious Case Reviews

FCHO understands that relevant statutory partner agencies are obliged to carry out serious case reviews and child death reviews as laid out in the Working Together Guidance 2018. FCHO will work with agencies to provide information were obliged by law to learn lessons and assist any enquiries.

2.8 Reporting and Investigating Concerns

2.8.1 Reporting

All colleagues and third parties have the responsibility to report concerns of abuse or disclosures made to them promptly as detailed in FCHO's Safeguarding Children and Young People Procedure. **If, however, there is a risk of serious or imminent danger/harm to the individual, the person witnessing the event must dial 999 and ask for the appropriate emergency service.**

FCHO will also maximise available opportunities to provide, or signpost tenants and customers to information and advice regarding safeguarding and ensure people are supported to report any safeguarding concerns.

When managing any allegation of abuse, we encourage our staff to be 'professionally curious' in spotting the signs. It is essential that information is recorded accurately and in a timely manner. In addition, FCHO colleagues or third parties may also be called upon to complete forms or requests for information from statutory agencies which include local authority, the local Safeguarding Team the police or NHS.

FCHO will make staff aware of their professional boundaries when working with children and young people through training, safeguarding procedures, and guidance within our staff code of conduct.

The Safeguarding Children and Young People Procedure provides details of where staff are required to log information relating to safeguarding concerns. A centralised safeguarding log will be overseen and maintained by the operational safeguarding leads to maintain a record of active safeguarding concerns to avoid cases going un-noticed.

2.8.2 Identifying and Preventing Abuse

Safeguarding issues may be brought to the attention of staff directly by residents, neighbours, contractors, or other agencies in contact with residents or their families. In addition, housing management staff working with residents or entering residents' homes to carry out visits, repairs, inspections, or interviews may encounter situations causing concerns for a child or young person's welfare. For Example:

- Children or young people whose care needs appear to be neglected or appear to be subjected to deliberate mistreatment.
- Neglect of a child or young person's needs because those around them are unable to be responsible for their care, for example signs of a parent/carer may have difficulties caused by poor health, debt, alcohol, or mental health problems.
- Where there is known or suspected domestic abuse.
- Children or Young people who say they are being abused.
- Children or young people left unattended in the household.
- Signs of neglect to the property such as damp and mould.

2.8.3 Reporting Barriers and Challenges

It is often difficult for children or young people to disclose or report instances of abuse. This may be for a number of reasons, including, but not limited to:

- Not having a voice i.e., a baby or young toddler.
- Loyalty to their abuser.
- Fear.
- Stigma.
- not realising it is abuse.
- not knowing how to report it.
- thinking they will not be taken seriously.
- feeling embarrassed.
- not wanting to get someone else into trouble.

Overcoming these barriers is key to ensuring that no abuse goes unnoticed or unaddressed. FCHO aims to achieve this by regularly exploring barriers to reporting abuse with customers during home visits, workshops, and customer focus groups.

This includes:

- discussing example cases
- using team meetings, training, and oversight to ensure colleagues are aware of how to recognise and respond to abuse, and how to empower and encourage customers to report it.
- encouraging services to learn from each Safeguarding Concern by including the need for service improvements, including overcoming barriers, to be recorded as part of every safeguarding investigation.

2.8.4 Whistleblowing

FCHO's whistleblowing policy encourages and supports colleagues to report concerns about the conduct of colleagues and/or third parties.

FCHO will report any safeguarding concerns raised about the conduct of colleagues to the Designated Safeguarding Lead and/or the Human Resources Department and act in accordance with the appropriate advice and guidance. FCHO will also make appropriate referrals to the Local Authority Designated Officer (LADO) in appropriate circumstances.

2.8.5 Policy Concerns

If a colleague or third party become aware that there are problems with the effective operation of this policy or associated procedures, they should report this to their line manager who will discuss with the Designated Safeguarding Lead and/or policy owner(s). This feedback will be incorporated into the policy and procedural review process.

2.9 Policy implementation and Continuous Improvement

2.9.1 Policy Implementation

The implementation of this policy requires the training of staff to ensure effective compliance of the policy. The Designated Safeguarding Officers will provide guidance, support and assistance to any manager, colleague, or contractor in the implementation of this and other Safeguarding procedures.

This policy will be published on FCHO Intranet and website for general access and viewing by all staff and customers.

A periodic review of the procedure shall take place to ensure its relevance and accuracy, unless:

- Legislation/regulation or sector developments require otherwise, ensuring that it continues to meet its objectives and takes account of good practice developments.
- We identify deficiencies or failures in this procedure, as a result of stakeholder feedback, complaints, or findings from any independent organisations.

2.9.2 Continuous Improvement

The Safeguarding Committee has a responsibility to implement any learning from existing or previous safeguarding cases. Operational Safeguarding Leads and Designated Safeguarding Officers will meet on a quarterly basis and will be responsible for collating data within their department which can be used to analyse any trends which may improve FCHO's approaches to safeguarding. The Safeguarding Committee will use a variety of ways to promote the welfare of children and young people which may involve safeguarding campaigns, updates to the intranet site, regular email updates to colleagues etc.

3 Legislative or other Guidelines

- The Childrens Act 2004
- Working Together Guidance 2023
- The Equality Act 2010
- General Data Protection Regulation (Data Protection Act 2018)

- FCHO Safeguarding Committee Terms of Reference
- FCHO Safeguarding Guidance Booklet
- FCHO Safeguarding Procedures
- FCHO Safeguarding Adults Policy
- FCHO Whistleblowing Policy
- FCHO Antisocial behaviour policy
- FCHO Domestic Abuse Policy
- FCHO Hate Crime Policy
- FCHO Safe Recruitment Policy

3.1 Equality, Diversity, and Inclusion

- 3.1.1 FCHO is committed to promoting equality, diversity, and inclusion, based on protected characteristics. We will take account of the needs and differences of all colleagues, customers and other stakeholders which may arise in line with this policy. We believe that everyone should be treated fairly and equally regardless of their difference.